

**United States District Court  
for the  
District Court**

---

**United States of America,**

**Plaintiff,**

**vs.**

**NOTICE OF MOTION AND MOTION  
TO QUASH THE UNITED STATES OF  
AMERICA'S SUBPOENA**

**Derek Michael Chauvin, et al.,**

**Defendants.**

**File No. 21-108 (PAM/TNL)**

---

**TO: THE HONORABLE TONY N. LEUNG, UNITED STATES MAGISTRATE JUDGE;  
THE HONORABLE PAUL A. MAGNUSON, UNITED STATES JUDGE; DEFENDANT  
DEREK MICHAEL CHAUVIN AND HIS ATTORNEY ERIC J. NELSON;  
DEFENDANT TOU THAO AND HIS ATTORNEYS NATALIE PAULE AND ROBERT  
M. PAULE; DEFENDANT J. ALEXANDER KUENG AND HIS ATTORNEY THOMAS  
C. PLUNKETT; THOMAS KEIRNAN LANE AND HIS ATTORNEY EARL P. GRAY;  
AND THE UNITED STATES OF AMERICA AND ITS ATTORNEY EVAN GILEAD.**

**NOTICE OF MOTION**

Please be advised that the City of Minneapolis will move the Court in front of United States Magistrate Judge Tony N. Leung or United States Judge Paul A. Magnuson, on a date and time to be determined, for an order to quash the subpoena dated December 28, 2021 that commands the release of private data.

**MOTION**

The City of Minneapolis respectfully moves the Court to quash the subpoena of the United States of America dated December 28, 2021 that commands the release of private data and other protected data. This motion is based on Federal Rules of Criminal Procedure, Rule 17, and Minnesota Statutes, Section 13.03, subd. 6.

Dated: January 7, 2022

JAMES R. ROWADER, JR.  
City Attorney  
By

s/ Caroline M. Bachun  
CAROLINE M. BACHUN (024370x)  
Assistant Minneapolis City Attorney  
210 City Hall, 350 S. 5<sup>th</sup> St.  
Minneapolis, MN 55415  
(612) 673-2754  
*Attorney for City of Minneapolis*